

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**LEHMAN BROTHERS HOLDINGS INC., *et al.*,
Debtors.**

Chapter 11

Case No. 08-13555 (SCC)

[PROPOSED] ORDER

Upon consideration of the motion, dated May 11, 2017 (the “Motion”), filed by Lehman Brothers Holdings Inc. (“LBHI” or the “Plan Administrator”), as Plan Administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors*, to Estimate Proof of Claim 29759 for Purposes of Allowance, and as described in the Motion, it is,

FOUND AND DETERMINED that:

- A. This Court has jurisdiction to hear the Motion and adjudicate the Motion.
- B. Any objections that were raised or that could have been raised in opposition to the Motion, that have not been withdrawn or resolved, are overruled and/or waived.
- C. On September 22, 2009, Standard Chartered Bank (“SCB”) filed Proof of Claim 29759 seeking reimbursement for (i) SCB’s outstanding fees under the LC Agreement with respect to the letter of credit described below, and (ii) any future drawing that may be made under such letter of credit. (the “Claim”);
- D. The Claim is contingent and unliquidated against LBHI’s estate subject to estimation under section 11 U.S.C. § 502(c) of the Bankruptcy Code; and

E. Due and proper notice of the Motion has been provided to all parties, and this Court, having considered the documents submitted concerning the foregoing Motion and proposed order, and good cause having been shown;

It is ORDERED, ADJUDGED AND DECREED that:

1. The Motion is granted.
2. Within 30 days after the Plan Administrator and SCB execute confidentiality stipulation, LBHI may serve upon SCB, Cadwalader, Wickersham & Taft, LLP ("CWT"), and WFP Tower A Co. Limited Partnership ("WFP Tower") requests and/or subpoenas for documents and/or interrogatory requests.
3. Within 60 days after documents have been received, LBHI may serve upon SCB, CWT, and WFP Tower Federal Rule of Civil Procedure 30(b)(6) notices for depositions on these topics:
 - a. On SCB: (i) status of the LC; (ii) amount of LC fees accrued; and (iii) SCB's assessment of the potential for a Termination of the CWT Lease or default prior to LC expiry.
 - b. On CWT: (i) current and projected financial condition and financial results; (ii) the importance of the CWT Lease to the firm's strategic direction; and (iii) any facts which bear upon the potential for a Termination or default of the CWT Lease prior to LC expiry.
 - c. On WFP Tower: Information it has on CWT's (i) current and projected financial condition and financial results; and (ii) any facts which bear upon the potential for a Termination or default of the CWT Lease prior to LC expiry.

4. Within 15 days after fact depositions are complete, parties shall identify experts, if any.

5. Within 30 days after the identification of an expert, initial expert reports shall be exchanged.

6. Any rebuttal expert reports shall be served within 30 days after the initial expert reports are exchanged.

7. Expert depositions shall be concluded within 30 days after rebuttal expert reports are exchanged.

8. Within 45 days after completing expert depositions (or fact depositions if no experts are used), LBHI and SCB will each provide the Court with their written submissions concerning the appropriate amount at which to estimate the Claim (the “Initial Submissions”).

9. Reply submissions in response to the Initial Submissions may be filed not later than 30 days after the Initial Submissions are filed.

10. The Court will hold a hearing on the Motion on a date chosen by the Court. Evidence considered by the Court at such hearing will be contained in documents or the product of discovery obtained by the parties, and that live testimony at such hearing, other than potential expert testimony, may not be required.

11. Notwithstanding any provision in the Federal Rules of Bankruptcy Procedure to the contrary, this Order will be immediately effective and enforceable upon its entry.

12. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

New York, New York
May __, 2017

HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE